

To: Daly, Carl[Daly.Carl@epa.gov]; Dygowski, Laurel[Dygowski.Laurel@epa.gov]
From: Mylott, Richard
Sent: Mon 8/12/2013 7:08:22 PM
Subject: RE: Wyoming regional haze

Thanks, the number in the desk statement is 77,153 tpy.

From: Daly, Carl
Sent: Monday, August 12, 2013 12:59 PM
To: Dygowski, Laurel
Cc: Mylott, Richard
Subject: FW: Wyoming regional haze

Can you help on these reporter questions, mostly #2?

Rich has already sent the reporter the 75k number we had in the comm strat for NOx reductions from our plan, but I'm wondering why WY is stating that our plan only gets 65.9k.

Rich wants to use IMPROVE to answer #3.

Thanks

Carl Daly

303-312-6416

From: Mylott, Richard
Sent: Monday, August 12, 2013 12:51 PM
To: Daly, Carl
Subject: FW: Wyoming regional haze

Qs. Let's respond via email, unless you feel differently.

1 : Is in the desk statement.

2 : Facility specific costs, and associated visibility benefits for various levels of controls, are clearly identified in EPA's proposal. These are controls that other states have

#3 : Measurements taken from visibility monitors at sites throughout the western U.S. (IMPROVE network, website?)

From: Holly Kays [<mailto:holly@buffalobulletin.com>]

Sent: Monday, August 12, 2013 12:26 PM

To: Mylott, Richard

Subject: Re: Wyoming regional haze

Rich, I should add that I am on deadline and need this information by 2 p.m. today.

On Aug 12, 2013, at 12:20 PM, Holly Kays wrote:

Thanks Rich, that would be great. I left a voicemail with Carl but have not heard back. My questions are:

1. In his public comments, Wyoming Governor Matt Mead said that Wyoming's plan would reduce NOx emissions by 63,000 tons per year compared to 65,900 tons in the EPA's plan and that the two plans would achieve "essentially identical" visibility results by 2022. That estimate for the EPA plan is different than the one you had mentioned when we spoke on the phone, which as I recall was closer to 75,00 tons (try as I might, I could not find the number in the EPA document, though I am certain it is there somewhere). How do you account for that difference?

2. An EPA fact sheet reads: "According to the Clean Air Act, as states conduct BART determinations for individual facilities, they must consider a number of factors, including:

1. the cost of the controls;
2. the impact of controls on energy availability or any non-air quality environmental impacts;
3. the remaining useful life of the equipment to be controlled; any existing pollution controls already in place; and
4. the visibility improvement that would result from controlling the emissions."

Many stakeholders who I have spoken to have said that implementing the proposed changes will cost them billions of dollars and will potentially cause the shut-down of existing plants due to the cost-benefit of implementing the changes. How would you respond to their charges that this outcome does not comply with the Clean Air Act requirement to take costs and energy availability into account when making air quality rules?

3. The fact sheet reads: "In the West, visual range has decreased from 140 miles to 35-90 miles." What kind of data were used to arrive at this number?

I would appreciate any answers you can give me to these questions and would like to discuss them by phone rather than email, because I don't want to misinterpret any of your responses without the opportunity to clarify. Thanks for your help in getting this information.

Holly

On Aug 12, 2013, at 11:43 AM, Mylott, Richard wrote:

Hi Holly, I'm out of the office this am, got your vm. Can you email the Qs you have? I'll try and connect with Carl...

From: Mylott, Richard

Sent: Friday, August 09, 2013 11:48 AM

To: 'holly@buffalobulletin.com'

Subject: FW: Wyoming regional haze

Hi Holly, thanks for your call earlier. Hope some of below helps clarify your Qs. As I mentioned, Carl Daly may be available Monday on off-the-record, background basis to help you clarify any technical issues.

Per your question where I'd get back to you on the scope of the regional haze rule: EPA's haze rule requires States to implement source control strategies across many sources of pollution. More info in the fact sheet

below: <http://www2.epa.gov/sites/production/files/documents/regionalhazefactsheetforjune2013publichearingincheyenne.pdf>

Also, you mentioned a few times various parties referring to "no differences" in visibility improvements in EPA's proposed plan itself. If you look at page 34779 and 34780, there are examples of tables (e.g. 49) that specify the visibility improvements associated with different levels of controls requirements at Dave Johnston #4, again just an example. Also, there are very clear statements in the plan (e.g. top of page 49) that explain where we agree and disagree with the State's analysis and the basis for our proposed action. Estimate cost requirements and cost effectiveness are also clearly identified. As this is a long document, just wanted to point these out as examples.

<http://www2.epa.gov/sites/production/files/documents/wyomingregionalhazereproposaljune2013.pdf>

Rich

From: Mylott, Richard

Sent: Wednesday, August 07, 2013 6:11 PM

To: holly@buffalobulletin.com

Cc: Daly, Carl

Subject: Wyoming regional haze

Holly-- thanks for your email on EPA's proposed action on Wyoming regional haze. We are in a live public comment period through August 26. We have been using the statement below.

Please let me know if you need any clarification.

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EPA is committed to providing all interested parties the opportunity to review and comment on our proposed action. EPA will consider all public comments and information received, including options for emission control technologies and the timing associated with their implementation, before issuing a final action.

EPA is proposing to approve a significant portion the State of Wyoming's regional haze plan. EPA is also proposing a federal plan for the remaining portions to ensure Clean Air Act requirements are met. These plans will result in a reduction of harmful nitrogen oxides (NOx), which have been associated with asthma, bronchitis, and other respiratory illnesses, by an estimated 77,153 tons per year. This action will also improve visibility, and protect natural resources and recreation-based economies, in some of the nation's most treasured national parks and wilderness areas.

As it has done with states across the country, EPA has worked, and will continue to work, with Wyoming to put in place a plan that relies on proven, cost-effective technologies to cut harmful pollution that reduces visibility. EPA is accepting comments on our proposed action through August 26. For more information, <http://www2.epa.gov/sites/production/files/documents/wyomingregionalhazereproposaljune2013.pdf>

Richard Mylott

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